

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
U.S. DISTRICT COURT  
CLERK'S OFFICE

JUN 30 2005 P 03

LAURA ALLEN, INDIVIDUALLY AND AS )  
ADMINISTRATRIX OF THE ESTATE OF )  
DAN ALLEN, AND AS NEXT FRIEND OF )  
TAYLOR ALLEN AND DANIELLE ALLEN, )  
and MARK ALLEN, )  
Plaintiffs )  
v. )  
MARTIN SURFACING, INC.; MARTIN )  
SURFACING, A DIVISION OF SOUTHWEST )  
RECREATION; RONALD RYBA; )  
SOUTHWEST RECREATIONAL )  
INDUSTRIES, INC., d/b/a MARTIN )  
SURFACING; REED J. SEATON; ROBERT N. )  
WOLESSENSKY, JR.; DYNAMIC SPORTS )  
CONSTRUCTION, INC. AND DOES, )  
Defendants )

CIVIL ACTION  
NO. 05-40048-FDS

**DEFENDANT, REED J. SEATON'S INITIAL DISCLOSURES**  
**PURSUANT TO FED.R.CIV.P., 26(a)(1) AND LOCAL RULE 26.2**

NOW comes the Co-Defendant, Reed J. Seaton, and makes the following as his Initial Disclosures herein:

1. Rule 26.1 (b)(2)(a): All Persons Known to this Defendant, Who Witnessed the Occurrence or Have Substantial Discoverable Information Regarding Same:

1. Reed J. Seaton;
2. Robert N. Wolsensky;
3. Ronald Ryba;
4. Laura Allen;
5. Taylor Allen;
6. Danielle Allen;
7. Mark Allen;
8. Representative(s), Martin Surfacing, Inc.;
9. Representative(s), Southwest Recreational Industries, Inc.;
10. Representative(s), Dynamic Sports Construction, Inc.;
11. Representative(s), College of the Holy Cross;
12. Timothy Bridges;
13. Alfred Morobito;

14. Representative(s), Pfizer, Inc.;
15. Representative(s), Parke-Davis, a division of Warner-Lambert Company;
16. Representative(s), Meadowbrook Insurance Group/TPA Associates;
17. Representative(s), Independent School Compensation Corporation;
18. Scott M. Merrill;
19. Jack McCann;
20. Gerard A. Zimmerman;
21. Lenny Raymond;
22. Joan E. Champagne;
23. Marcie Wolinsky-Friedland, M.D.;
24. Leo Fanning;
25. Bob Griffin; and
26. Dick Regan.

2. Rule 26.1 (b)(2)(b): All Opposing Parties From Whom Statements Have Been Taken:

1. None

3. Rule 26.1 (b)(2)(c): All Government Agencies Known to Have Investigated Occurrence:

1. None

4. List of Documents Voluntarily Provided Herewith In Lieu Of Formal Discovery:

1. This defendant agrees to make available for copying a full and complete copy of any and all insurance policies which do or may provide coverage for this defendant with respect to the matter, upon receipt of the same.
2. This defendant agrees to make available for copying any and all relevant corporate records, if any, relative to Reed J. Seaton, *vis-a-vis* Martin Surfacing, Inc., Southwest Recreational Industries, Inc., and/or Dynamic Sports Construction, Inc., upon receipt of the same.

REED J. SEATON

By his attorneys,

  
\_\_\_\_\_  
Joseph M. Noone (BBO #559644)  
James T. Sullivan (BBO #565700)  
AVERY, DOOLEY, POST & AVERY, LLP  
90 Concord Avenue  
Belmont, MA 02478  
(617) 489-5300

Dated: June 29, 2005

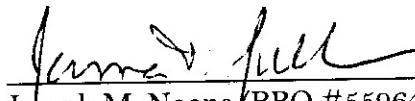
CERTIFICATE OF SERVICE

I, James T. Sullivan, hereby certify that I have this 29<sup>th</sup> day of June, 2005, forwarded the within **Defendant, Reed J. Seaton's Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2** to all counsel of record by delivering same, first class mail, postage prepaid, to:

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BONSIGNORE & BREWER  
23 Forest Street  
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